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SEAGATE TECHNOLOGY LLC

11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

14 IN RE SEAGATE TECHNOLOGY LLC  
LITIGATION

Case No. 3:16-cv-00523-JCS

15 CONSOLIDATED ACTION

**JOINT STIPULATION AND ~~PROPOSED~~  
ORDER TO CONTINUE THE MARCH 29,  
2019 CASE MANAGEMENT  
CONFERENCE AND EXTEND THE  
DEADLINE TO FILE A JOINT CASE  
MANAGEMENT STATEMENT**

24 This Joint Stipulation is made by and between Plaintiffs and Seagate Technology LLC  
25 (“Seagate,” and together with Plaintiffs, the “Parties”), by and through their respective  
26 undersigned counsel of record, with reference to the following facts:  
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28

**RECITALS**

1. WHEREAS, Plaintiffs filed a renewed motion for class certification (“Motion”) on October 15, 2018 (Dkt. 189);
2. WHEREAS, the Court denied Plaintiffs’ Motion on January 22, 2019 (Dkt. 200);
3. WHEREAS, the Court instructed the parties “to meet and confer regarding a plan to resolve or try Plaintiffs’ individual claims.”
4. WHEREAS the Court had ordered the parties to file a joint case management statement (“Joint CMC Statement”) no later than February 22, 2019 (*id.*);
5. WHEREAS, the Court had further ordered that a case management conference (“CMC”) be held on March 1, 2019 at 2:00 pm (*id.*);
6. WHEREAS, on February 21, 2019, pursuant to a stipulation of the Parties, the Court ordered that the CMC be continued until March 15, 2019 at 2:00 pm and the deadline for the parties to file the Joint CMC Statement be extended until March 8, 2019 (Dkt. 210);
7. WHEREAS, on March 12, 2019, pursuant to a stipulation of the Parties, the Court ordered that the CMC be continued until March 29, 2019 at 2:00 pm and the deadline for the parties to file the Joint CMC Statement be extended until March 22, 2019 (Dkt. 212);
8. WHEREAS the parties have reached an agreement in principle to resolve the litigation, subject to documentation;
9. WHEREAS, the Parties have agreed, subject to the Court’s approval and availability, that the CMC be continued until April 12, 2019, or the earliest available date thereafter; and
10. WHEREAS, the Parties have agreed, subject to the Court’s approval, that the deadline to file the Joint CMC Statement be extended until April 5, 2019.

**STIPULATION**

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN THE PARTIES that, subject to the Court’s approval and availability:

(1) the Case Management Conference presently calendared for March 29, 2019 at 2:00 pm 10:00 a.m. (special setting) in Courtroom D, 15th Floor, SF, CA be continued until April 12, 2019 at 2:00 pm; and

(2) the deadline for the parties to file a joint case management statement be extended until April 5, 2019.

Dated: March 22, 2019

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By /s/ Neil A.F. Popović  
NEIL A.F. POPOVIĆ

Attorneys for Defendant  
SEAGATE TECHNOLOGY LLC

I, Neil A.F. Popović, whose user ID and password are used to efile this document, hereby attests that, pursuant to Local Rule 5.1(i)(3), concurrence in this filing was obtained from each of the other Signatories, in lieu of each's signature.

Dated: March 22, 2019

HAGENS BERMAN SOBOL SHAPIRO LLP

By /s/  
STEVE W. BERMAN

Attorneys for Plaintiffs

Dated: March 22, 2019

AXLER GOLDICH LLC

By /s/  
MARC A. GOLDICH (*Pro Hac Vice*)

Attorneys for Plaintiffs

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: 3/22/19

  
The Honorable Joseph C. Spero  
Chief Magistrate Judge